

Internal Revenue bulletin

Bulletin No. 1998-48
November 30, 1998

HIGHLIGHTS OF THIS ISSUE

These synopses are intended only as aids to the reader in identifying the subject matter covered. They may not be relied upon as authoritative interpretations.

EMPLOYEE PLANS

Announcement 98-106, page 9.

The Service announces a change to the distribution codes to be used on Form 1099-R, Distributions From Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, Etc., when reporting distributions from Roth IRAs.

EXEMPT ORGANIZATIONS

Announcement 98-107, page 10.

A list is given of organizations now classified as private foundations.

Announcement 98-108, page 11.

A public hearing on proposed regulations REG-121268-97, 1998-20 I.R.B. 12, which clarify when the travel and tour

activities of tax exempt organizations are substantially related to the purposes for which exemption was granted, will be held on February 10, 1999.

ADMINISTRATIVE

REG-102023-98, page 6.

Proposed regulations under section 6011 of the Code relate to the requirements for filing partnership returns on magnetic media. A public hearing will be held January 13, 1999.

Rev. Proc. 98-57, page 5.

Qualified Zone Academy Bond Limitations for 1999. This procedure sets forth the maximum face amount of Qualified Zone Academy Bonds that may be issued for each State in 1999. For this purpose "State" includes the District of Columbia and the possessions of the United States.

Finding Lists begin on page 14.

The IRS Mission

Provide America's taxpayers top quality service by helping them understand and meet their tax responsibilities

and by applying the tax law with integrity and fairness to all.

Statement of Principles of Internal Revenue Tax Administration

The function of the Internal Revenue Service is to administer the Internal Revenue Code. Tax policy for raising revenue is determined by Congress.

With this in mind, it is the duty of the Service to carry out that policy by correctly applying the laws enacted by Congress; to determine the reasonable meaning of various Code provisions in light of the Congressional purpose in enacting them; and to perform this work in a fair and impartial manner, with neither a government nor a taxpayer point of view.

At the heart of administration is interpretation of the Code. It is the responsibility of each person in the Service, charged with the duty of interpreting the law, to try to find the true meaning of the statutory provision and not to adopt a strained construction in the belief that he or she is "protecting the revenue." The revenue is properly protected only when we ascertain and apply the true meaning of the statute.

The Service also has the responsibility of applying and administering the law in a reasonable, practical manner. Issues should only be raised by examining officers when they have merit, never arbitrarily or for trading purposes. At the same time, the examining officer should never hesitate to raise a meritorious issue. It is also important that care be exercised not to raise an issue or to ask a court to adopt a position inconsistent with an established Service position.

Administration should be both reasonable and vigorous. It should be conducted with as little delay as possible and with great courtesy and considerateness. It should never try to overreach, and should be reasonable within the bounds of law and sound administration. It should, however, be vigorous in requiring compliance with law and it should be relentless in its attack on unreal tax devices and fraud.

Introduction

The Internal Revenue Bulletin is the authoritative instrument of the Commissioner of Internal Revenue for announcing official rulings and procedures of the Internal Revenue Service and for publishing Treasury Decisions, Executive Orders, Tax Conventions, legislation, court decisions, and other items of general interest. It is published weekly and may be obtained from the Superintendent of Documents on a subscription basis. Bulletin contents of a permanent nature are consolidated semiannually into Cumulative Bulletins, which are sold on a single-copy basis.

It is the policy of the Service to publish in the Bulletin all substantive rulings necessary to promote a uniform application of the tax laws, including all rulings that supersede, revoke, modify, or amend any of those previously published in the Bulletin. All published rulings apply retroactively unless otherwise indicated. Procedures relating solely to matters of internal management are not published; however, statements of internal practices and procedures that affect the rights and duties of taxpayers are published.

Revenue rulings represent the conclusions of the Service on the application of the law to the pivotal facts stated in the revenue ruling. In those based on positions taken in rulings to taxpayers or technical advice to Service field offices, identifying details and information of a confidential nature are deleted to prevent unwarranted invasions of privacy and to comply with statutory requirements.

Rulings and procedures reported in the Bulletin do not have the force and effect of Treasury Department Regulations, but they may be used as precedents. Unpublished rulings will not be relied on, used, or cited as precedents by Service personnel in the disposition of other cases. In applying published rulings and procedures, the effect of subsequent legislation, regulations, court decisions, rulings, and proce-

dures must be considered, and Service personnel and others concerned are cautioned against reaching the same conclusions in other cases unless the facts and circumstances are substantially the same.

The Bulletin is divided into four parts as follows:

Part I.—1986 Code.

This part includes rulings and decisions based on provisions of the Internal Revenue Code of 1986.

Part II.—Treaties and Tax Legislation.

This part is divided into two subparts as follows: Subpart A, Tax Conventions, and Subpart B, Legislation and Related Committee Reports.

Part III.—Administrative, Procedural, and Miscellaneous.

To the extent practicable, pertinent cross references to these subjects are contained in the other Parts and Subparts. Also included in this part are Bank Secrecy Act Administrative Rulings. Bank Secrecy Act Administrative Rulings are issued by the Department of the Treasury's Office of the Assistant Secretary (Enforcement).

Part IV.—Items of General Interest.

With the exception of the Notice of Proposed Rulemaking and the disbarment and suspension list included in this part, none of these announcements are consolidated in the Cumulative Bulletins.

The first Bulletin for each month includes a cumulative index for the matters published during the preceding months. These monthly indexes are cumulated on a semiannual basis and are published in the first Bulletin of the succeeding semiannual period, respectively.

The contents of this publication are not copyrighted and may be reprinted freely. A citation of the Internal Revenue Bulletin as the source would be appropriate.

For sale by the Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402.

Part I. Rulings and Decisions Under the Internal Revenue Code of 1986

Section 1397E.—Credit to Holders of Qualified Zone Academy Bonds

What is the 1999 qualified zone academy bond national limitation for each State, the District of Columbia, and the possessions of the United States? See Rev. Proc. 98-57, page 5.

Part III. Administrative, Procedural, and Miscellaneous

26 CFR 601.601: Rules and regulations.
(Also Part I, § 1397E)

Rev. Proc. 98-57

SECTION 1. PURPOSE

This revenue procedure sets forth the maximum face amount of Qualified Zone Academy Bonds (“Bond” or “Bonds”) that may be issued for each State during 1999. For this purpose “State” includes the District of Columbia and the possessions of the United States.

SECTION 2. BACKGROUND

.01 Section 226 of the Tax Relief Act of 1997, Pub. L. 105-34, 111 Stat. 788 (1997), added § 1397E to the Internal Revenue Code to provide a credit to holders of Bonds under certain circumstances so that the Bonds generally can be issued without discount or interest. Ninety-five percent of Bond proceeds are to be used for qualified purposes, as defined by § 1397E(d)(5), with respect to a qualified zone academy, as defined by § 1397E(d)(4).

.02 The aggregate amount of Bonds that may be issued for the States is limited to \$400 million for 1998 and \$400 million for 1999 (the “national limitation”), unless the carryover provisions of § 1397E(e)(4) apply. This amount is to be allocated among the States by the Secretary on the basis of their respective populations below the poverty level (as defined by the Office of Management and Budget) and is to be further allocated by the State to qualified zone academies within the State or possession. A State may carry forward to the next calendar year any amount of an allocation of the national limitation for a calendar year that is in excess of the amount of Bonds issued during that calendar year that are designated with respect to qualified academies within the State.

.03 Rev. Proc. 98-9, 1998-3 I.R.B. 56, allocated the national limitation for 1998 among the States and possessions.

SECTION 3. SCOPE

This revenue procedure applies to Bonds issued under § 1397E during 1999.

SECTION 4. NATIONAL QUALIFIED ZONE ACADEMY BOND LIMITATION FOR 1999

The total face amount of bonds that may be issued in 1999 is \$400 million. This amount is allocated among the States as follows:

STATE	MAXIMUM FACE AMOUNT OF BONDS THAT MAY BE ISSUED DURING 1999 (thousands of dollars)
ALABAMA	\$ 7,015
ALASKA	591
ARIZONA	8,408
ARKANSAS	5,433
CALIFORNIA	57,589
COLORADO	3,376
CONNECTICUT	2,975
DELAWARE	760
DISTRICT OF COLUMBIA	1,192
FLORIDA	21,689
GEORGIA	11,699
HAWAII	1,730
IDAHO	1,931
ILLINOIS	14,231
INDIANA	5,433
IOWA	2,848
KANSAS	2,637
KENTUCKY	6,572
LOUISIANA	7,290
MAINE	1,308
MARYLAND	4,452
MASSACHUSETTS	7,722
MICHIGAN	10,613
MINNESOTA	4,821
MISSISSIPPI	4,800
MISSOURI	6,614
MONTANA	1,466
NEBRASKA	1,720
NEVADA	2,004
NEW HAMPSHIRE	1,150

STATE	MAXIMUM FACE AMOUNT OF BONDS THAT MAY BE ISSUED DURING 1999 (thousands of dollars)
NEW JERSEY	\$ 7,775
NEW MEXICO	4,083
NEW YORK	31,426
NORTH CAROLINA	8,851
NORTH DAKOTA	918
OHIO	12,986
OKLAHOMA	4,810
OREGON	4,030
PENNSYLVANIA	14,104
RHODE ISLAND	1,266
SOUTH CAROLINA	5,275
SOUTH DAKOTA	1,234
TENNESSEE	8,345
TEXAS	34,781
UTAH	1,952
VERMONT	570
VIRGINIA	9,051
WASHINGTON	5,581
WEST VIRGINIA	3,017
WISCONSIN	4,452
WYOMING	696
AMERICAN SAMOA	367
GUAM	217
NORTHERN MARIANAS	337
PUERTO RICO	23,484
VIRGIN ISLANDS	323

SECTION 6. EFFECTIVE DATE

This revenue procedure applies to Bonds issued after December 31, 1998.

DRAFTING INFORMATION

The principal author of this revenue procedure is Rose Weber of the Office of Assistant Chief Counsel (Financial Institutions & Products). For further information regarding this revenue procedure contact Ms. Weber on (202) 622-3980 (not a toll free call).

Part IV. Items of General Interest

Notice of Proposed Rulemaking and Notice of Public Hearing

Partnership Returns Required on Magnetic Media

REG-102023-98

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Notice of proposed rulemaking and notice of public hearing.

SUMMARY: This document contains proposed regulations relating to the requirements for filing partnership returns on magnetic media under section 6011(e) of the Internal Revenue Code. The proposed regulations reflect changes to the law made by the Taxpayer Relief Act of 1997. The proposed regulations affect partnerships with more than 100 partners. This document also provides a notice of a public hearing on these proposed regulations.

DATES: Written comments must be received by January 21, 1999. Requests to speak (with outlines of oral comments) at the public hearing scheduled for January 13, 1999, must be received by December 23, 1998.

ADDRESSES: Send submissions to: CC:DOM:CORP:R (REG-102023-98), Room 5228, Internal Revenue Service, POB 7604, Ben Franklin Station, Washington, DC 20044. Submissions may be hand delivered Monday through Friday between the hours of 8 a.m. and 5 p.m. to: CC:DOM:CORP:R (REG-102023-98), Courier's Desk, Internal Revenue Service, 1111 Constitution Avenue NW, Washington, DC.

Alternatively, taxpayers may submit comments electronically via the Internet by selecting the "Tax Regs" option on the IRS Home Page, or by submitting comments directly to the IRS Internet site at http://www.irs.ustreas.gov/prod/tax_regs/comments.html. The public hearing will be held in Room 2615, Internal Revenue Building, 1111 Constitution Avenue, NW, Washington, DC 20224.

FOR FURTHER INFORMATION CONTACT: Concerning the proposed regulations, Bridget E. Finkenaur, 202-622-4940; concerning submissions of comments, the hearing, and/or to be placed on the building access list to attend the hearing, Mike Slaughter, 202-622-7190 (not toll-free numbers).

SUPPLEMENTARY INFORMATION:

Background

This document contains proposed amendments to the Regulations on Procedure and Administration (26 CFR part 301) relating to the filing of partnership returns on magnetic media under section 6011(e)(2) of the Internal Revenue Code. Section 6011(e)(2) was amended by section 1224 of the Taxpayer Relief Act of 1997, Public Law 105-34 (111 Stat. 788 (1997)) (the Act), effective for taxable years ending on or after December 31, 1997. Section 6012(e) of the Internal Revenue Service Restructuring and Reform Act of 1998, Public Law 105-206 (112 Stat. 685 (1998)), changes the effective date of section 1224 of the Act to taxable years beginning after December 31, 1997.

Section 6011(e) authorizes the Secretary to prescribe regulations providing the standards for determining which returns must be filed on magnetic media or in other machine-readable form. Section 6011(e)(2)(A) provides that the regulations may not require any person to file returns on magnetic media unless the person is required to file at least 250 returns during the calendar year. However, the last sentence of section 6011(e)(2), which was added by section 1224 of the Act, provides that the Secretary must prescribe regulations requiring partnerships with more than 100 partners to file returns on magnetic media. In addition, section 6011(e)(2)(B) requires that the regulations take into account (among other relevant factors) the ability of the taxpayer to comply at reasonable cost with the requirements of the regulations.

Currently, the IRS permits certain partnerships to file their partnership returns on magnetic media (including magnetic tape, floppy disk, and electronic filing) with the

Internal Revenue Service Center in Andover, Massachusetts. Under this voluntary program, participants have the option of: (1) submitting the entire partnership tax return (including Form 1065, U.S. Partnership Return of Income, Schedules K-1, Partner's Share of Income, Credits, Deductions, etc., and all other related forms and schedules) on magnetic media, or (2) submitting only the Schedules K-1 on magnetic media and filing the rest of the partnership return on paper.

In Notice 97-77 (1997-52 I.R.B. 18 (December 29, 1997)), the IRS notified taxpayers that the Act's amendment to section 6011(e)(2) is not self-executing. Rather, the IRS must first issue regulations that would require partnerships with more than 100 partners to file their partnership returns on magnetic media. Accordingly, partnerships were not required to file their 1997 partnership returns on magnetic media.

Explanation of Provisions

In General

The proposed regulations provide that partnerships with more than 100 partners must file their partnership returns on magnetic media. The determination of whether a partnership has more than 100 partners is made by counting the number of partners the partnership had over the partnership's taxable year, regardless of whether a partner was a partner for the entire year or whether the partnership had over 100 partners on any particular day in the year.

The proposed regulations provide that a partnership return is a form in Series 1065 (including Form 1065, U.S. Partnership Return of Income, and Form 1065-B, U.S. Return of Income for Electing Large Partnerships), along with the corresponding Schedules K-1 and all other related forms and schedules that are required to be attached to the Series 1065 form.

Magnetic media means any magnetic media permitted under applicable regulations, revenue procedures, or publications. The IRS will prescribe procedures for participation in the mandatory magnetic media filing program for partnerships with more than 100 partners. In-

cluded in those procedures will be methods for registering for the program and signing the partnership return. The procedures will be contained in applicable revenue procedures or publications.

The term magnetic media generally includes magnetic tape, tape cartridge, and diskette, as well as other media (such as electronic filing). Consistent with the definition of magnetic media in other regulations, the proposed regulations define magnetic media broadly. However, under these regulations, the Service plans to require partnerships with more than 100 partners to file their partnership returns electronically. These requirements for electronic filing will be detailed in applicable revenue procedures or publications.

The IRS and Treasury Department believe that requiring affected partnerships to file electronically will enhance the quality of IRS's customer service and will reduce the costs associated with maintaining the ability to accept forms in a variety of magnetic media. Furthermore, the IRS and Treasury Department believe that electronic filing has less burden on taxpayers than filing using other forms of magnetic media.

Electronic filing reduces the normal processing time associated with paper returns in that there is minimal hands-on processing and, therefore, there are no paperwork delays. Faster processing means faster settling of accounts and better customer service. Electronic filing also reduces errors and increases security by reducing duplicate or erroneous returns. In addition, taxpayers receive prompt acknowledgment that their returns have been received and accepted by the Internal Revenue Service. Finally, electronic filing reduces the operating costs for taxpayers whose data already resides on a computer system. Overall, electronic filing of partnership returns should increase customer satisfaction and confidence in the filing process, and be more cost effective for partnerships.

Although the IRS Service Center in Andover, Massachusetts currently accepts returns in the voluntary program on various forms of magnetic media, the systems at this facility are not year 2000 compliant and will not be in operation after 1999. Accordingly, in designing its new magnetic media systems to accept electroni-

cally filed returns only, the IRS anticipates that it will no longer be able to accept returns filed in the form currently used by some partnerships in the voluntary program.

Hardship Waiver

The proposed regulations provide procedures for granting waivers of the magnetic media filing requirements for one or more years in cases of hardship. A determination of hardship will be based upon all of the facts and circumstances. Some factors that will be considered in granting waivers include the reasonableness of the incremental cost to the partnership of complying with the magnetic media filing requirements as well as temporary equipment breakdowns and destruction of magnetic media filing equipment.

Penalties

The proposed regulations provide that if a partnership has more than 100 partners and is required to file a partnership return, but fails to file its Series 1065 form, accompanying Schedules K-1, and all other related forms and schedules in the manner required, the partnership is deemed to have failed to file correct information returns for purposes of the information reporting penalty under section 6721. Penalties for failure to file correct information returns would apply for each Schedule K-1 that is not filed using permissible magnetic media.

Proposed Effective Dates

The IRS is currently focusing a significant portion of its resources on the Year 2000 date change. In addition, the IRS is developing new programs to accommodate the new Form 1065-B and partnership returns filed with a foreign address on the Series 1065 form. Further, partnerships will have to update their processes and technology to implement the electronic filing requirements.

Taking these factors into consideration, the proposed regulations would delay the effective date for filing partnership returns on magnetic media, and phase in the magnetic media filing of certain partnership returns. Thus, the proposed regulations would be generally effective for partnership returns for partnership taxable

years ending on or after December 31, 1999. However, electing large partnerships under section 775 and partnerships using foreign addresses on their Series 1065 forms would not be required to file their partnership returns using magnetic media for taxable years ending before January 1, 2001.

Special Analyses

It is hereby certified that the regulations in this document will not have a significant economic impact on a substantial number of small entities. This certification is based on a determination that these regulations will impose no additional reporting or recordkeeping requirement and will prescribe only the method for filing partnership returns that are already required to be filed under section 6031. Accordingly, a Regulatory Flexibility Analysis under the Regulatory Flexibility Act (5 U.S.C. chapter 6) is not required.

It has been determined that this notice of proposed rulemaking is not a significant regulatory action as defined in EO 12866. Therefore, a regulatory assessment is not required.

Pursuant to section 7805(f) of the Internal Revenue Code, this notice of proposed rulemaking will be submitted to the Chief Counsel for Advocacy of the Small Business Administration for comment on its impact on small business.

Comments and Public Hearing

Before these proposed regulations are adopted as final regulations, consideration will be given to any comments that are submitted timely to the IRS. All comments will be available for public inspection and copying.

A public hearing has been scheduled for Wednesday, January 13, 1999, at 10 a.m. in Room 2615 of the Internal Revenue Building, 1111 Constitution Avenue, NW, Washington, DC. Due to building security procedures, visitors must enter at the 10th Street entrance, located between Constitution and Pennsylvania Avenues, NW. In addition, all visitors must present photo identification to enter the building. Because of access restrictions, visitors will not be admitted beyond the immediate entrance area more than 15 minutes before the hearing starts. For information about having your name

placed on the building access list to attend the hearing, see the "FOR FURTHER INFORMATION CONTACT" section of this preamble.

The rules of 26 CFR 601.601(a)(3) apply to the hearing.

Persons that wish to present oral comments at the hearing must submit comments and an outline of the topics to be discussed and the time to be devoted to each topic by December 23, 1998.

A period of 10 minutes will be allotted to each person for making comments.

An agenda showing the scheduling of the speakers will be prepared after the deadline for receiving outlines has passed. Copies of the agenda will be available free of charge at the hearing.

Drafting Information

The principal author of these proposed regulations is Bridget E. Finkenaur, Office of the Assistant Chief Counsel (Income Tax and Accounting). However, other personnel from the IRS and Treasury Department participated in the development of these proposed regulations.

* * * * *

Proposed Amendments to the Regulations

Accordingly, 26 CFR parts 1 and 301 are proposed to be amended as follows:

PART 1—INCOME TAXES

Paragraph 1. The authority citation for part 1 continues to read as follows:

Authority: 26 U.S.C. 7805 * * *

Par. 2 Section 1.6031(a) as proposed to be added at 63 F.R. 3679 is amended by adding paragraph (e)(i)(iv) read as follows:

§1.6031(a)-1 Return of partnership income.

* * * * *

(e) * * *

(1) * * *

(iv) *Returns filed on magnetic media.* Notwithstanding the provisions of paragraphs (e)(1)(i) and (ii) of this section, the return of a partnership that is required to be filed on magnetic media under §301.6011-3 of this chapter must be filed at the Service Center indicated in relevant Internal Revenue Service revenue proce-

dures, publications, forms, or instructions.

* * * * *

PART 301—PROCEDURE AND ADMINISTRATION

Par. 4. The authority citation for part 301 is amended by adding an entry in numerical order to read as follows:

Authority: 26 U.S.C. 7805 * * *

Section 301.6011-3 also issued under 26 U.S.C. 6011; * * *

Par. 5. Section 301.6011-3 is added to read as follows:

§301.6011-3 Required use of magnetic media for partnership returns.

(a) *Partnership returns required on magnetic media.* If a partnership with more than 100 partners is required to file a partnership return pursuant to §1.6031(a)-1 of this chapter, the information required by the applicable forms and schedules must be filed on magnetic media, except as otherwise provided in paragraph (b) of this section. Returns filed on magnetic media must be made in accordance with applicable revenue procedures or publications. In prescribing revenue procedures or publications, the Commissioner may determine that partnerships will be required to use any one form of magnetic media filing. For example, the Commissioner may determine that partnerships with more than 100 partners must file their partnership returns electronically. In filing its return, a partnership must register to participate in the magnetic media filing program in the manner prescribed by the Internal Revenue Service in applicable revenue procedures or publications.

(b) *Waiver.* The Commissioner may waive the requirements of this section if hardship is shown in a request for waiver filed in accordance with this paragraph (b). A determination of hardship will be based upon all of the facts and circumstances. One factor in determining hardship will be the reasonableness of the incremental cost to the partnership of complying with the magnetic media filing requirements. Other factors, such as equipment breakdowns or destruction of magnetic media filing equipment, also may be considered. A request for waiver must be made in accordance with applica-

ble revenue procedures or publications. The waiver will specify the type of partnership return and the period to which it applies. The waiver will also be subject to such terms and conditions regarding the method of filing as may be prescribed by the Commissioner.

(c) *Failure to file.* If a partnership fails to file a partnership return on magnetic media in the manner required and when required to do so by this section, the partnership will be deemed to have failed to file the return in the manner prescribed for purposes of the information return penalty under §6721. See §301.6724-1(c)(3) for rules regarding the waiver of penalties for undue economic hardship relating to filing returns on magnetic media.

(d) *Meaning of terms.* The following definitions apply for purposes of this section:

(1) *Magnetic media.* The term *magnetic media* means any magnetic media permitted under applicable regulations, revenue procedures, or publications. These generally include magnetic tape, tape cartridge, and diskette, as well as other media (such as electronic filing) specifically permitted under the applicable regulations, procedures, or publications.

(2) *Partnership.* The term *partnership* means a partnership as defined in §1.761-1(a) of this chapter.

(3) *Partner.* The term *partner* means a member of a partnership as defined in §7701(a)(2).

(4) *Partnership return.* The term *partnership return* means a form in Series 1065 (including Form 1065, U.S. Partnership Return of Income, and Form 1065-B, U.S. Return of Income for Electing Large Partnerships), along with the corresponding Schedules K-1 and all other related forms and schedules that are required to be attached to the Series 1065 form.

(5) *Partnerships with more than 100 partners.* A partnership has more than 100 partners if, over the course of the partnership's taxable year, the partnership had more than 100 partners, regardless of whether a partner was a partner for the entire year or whether the partnership had over 100 partners on any particular day in the year. For purposes of this paragraph (d)(5), however, only those persons having a direct interest in the partnership

must be considered partners for purposes of determining the number of partners during the partnership's taxable year.

(e) *Examples.* The following examples illustrate the provisions of paragraph (d)(5) of this section. In the examples, the partnerships utilize the calendar year, and the taxable year in question is 1999:

Example 1. Partnership P had five general partners and 90 limited partners on January 1, 1999. On March 15, 1999, 10 more limited partners acquired an interest in P. On September 30, 1999, the 10 newest partners sold their individual partnership interests to C, a corporation which was one of the original 90 limited partners. On December 31, 1999, P had the same five general partners and 90 limited partners it had on January 1, 1999. P had a total of 105 partners over the course of partnership taxable year 1999. Therefore, P must file its 1999 partnership return on magnetic media.

Example 2. Partnership Q is a general partnership that had 95 partners on January 1, 1999. On March 15, 1999, 10 partners sold their individual partnership interests to corporation D, which was not previously a partner in Q. On September 30, 1999, corporation D sold one-half of its partnership interest in equal shares to five individuals, who were not previously partners in Q. On December 31, 1999, Q had a total of 91 partners, and on no date in the year did Q have more than 100 partners. Over the course of the year, however, Q had 101 partners. Therefore, Q must file its 1999 partnership return on magnetic media.

Example 3. Partnership G is a general partnership with 100 partners on January 1, 1999. There are no new partners added to G in 1999. One of G's partners, A, is a partnership with 53 partners. A is

one partner, regardless of the number of partners A has. Therefore, G has 100 partners and is not required to file its 1999 partnership return on magnetic media.

(f) *Effective date.* In general, this section applies to partnership returns for taxable years ending on or after December 31, 1999. However, electing large partnerships under §775 and partnerships using foreign addresses on their Series 1065 forms are not required to file using magnetic media for taxable years ending before January 1, 2001.

Par. 6. Section 301.6031-1 is revised to read as follows:

§301.6031-1 Return of partnership income.

For provisions relating to the requirement of returns of partnership income, see §1.6031(a)-1 of this chapter. For provisions relating to magnetic media filing of partnership returns, see §301.6011-3.

Par. 7. Section 301.6721-1 is amended by removing the third, fourth, and fifth sentences of paragraph (a)(2)(ii) and adding four sentences in their place to read as follows:

§301.6721-1 Failure to file correct information returns.

(a) * * *

(2) * * *

(ii) * * * However, no penalty is imposed under paragraph (a)(1) of this section solely by reason of any failure to comply with the requirements of §6011(e)(2), except to the extent that such a failure occurs with respect to more than 250 information returns (the 250-threshold requirement) or in the case of a partnership with more than 100 partners, more than 100 information returns (the 100-threshold requirement) (collectively, the threshold requirements). Each Schedule K-1 considered in applying the 100-threshold requirement will be treated as a separate information return. These threshold requirements apply separately to each type of information return required to be filed. Further, these threshold requirements apply separately to original and corrected returns. * * *

* * * * *

Michael P. Dolan,
Deputy Commissioner of
Internal Revenue.

(Filed by the Office of the Federal Register on October 22, 1998, 8:45 a.m., and published in the issue of the Federal Register for October 23, 1998, 63 F.R. 56878)

Changes to Codes for Roth IRAs on Form 1099-R Announcement 98-106

Purpose	The purpose of this announcement is to advise payers making distributions from Roth IRAs of changes to the distributions codes on Form 1099-R, Distributions From Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, etc.
Background	The Internal Revenue Service Restructuring and Reform Act of 1998 (Public Law 105-206) amended Internal Revenue Code section 408A, dealing with Roth IRAs. Because of these amendments, the Service has concluded that code K (Distribution from a 1998 Roth conversion IRA in the first 5 years) on the 1998 Form 1099-R may not be needed. In addition, a new code for recharacterizations is needed.
1998 Form 1099-R	Code K, to be used in box 7 on the 1998 Form 1099-R, is now optional. All distributions from a Roth IRA or Roth conversion IRA can be reported using code J, Distribution from a Roth IRA in first 5 years, in box 7.
1999 Form 1099-R	Code K will be eliminated on the 1999 Form 1099-R. Code J will be changed to "Distribution from a Roth IRA." Use Code J when reporting any distribution from a Roth IRA or Roth conversion IRA. Code R, Recharacterized IRA contribution, will be added to identify a recharacterization of an IRA contribution.

Foundations Status of Certain Organizations

Announcement 98-107

The following organizations have failed to establish or have been unable to maintain their status as public charities or as operating foundations. Accordingly, grantors and contributors may not, after this date, rely on previous rulings or designations in the Cumulative List of Organizations (Publication 78), or on the presumption arising from the filing of notices under section 508(b) of the Code. This listing does *not* indicate that the organizations have lost their status as organizations described in section 501(c)(3), eligible to receive deductible contributions.

Former Public Charities. The following organizations (which have been treated as organizations that are not private foundations described in section 509(a) of the Code) are now classified as private foundations:

Austin Metropolitan Economic Development Corporation, Austin, TX
Autonomous Zone Foundation, Chicago, IL
Avery County Agricultural and Horticultural Fair Inc., Newland, NC
Awakening Inc., Milwaukee, WI
Awareness Communication Incorporated, Williamsport, PA
B & J Community Care Home, Columbia, SC
B A I R, South San Francisco, CA
B A Y Theatre Co. Inc., Birmingham, AL
BABC Inc., Denver, CO
Babe Ruth League of Brockton, Brockton, MA
Babe Ruth League of Somerville Inc., Somerville, MA
Backcountry Volunteers Inc., N. Scituate, MA
Backstage Inc., Decatur, AL
Backstage Productions Inc., Atlanta, GA
Bainbridge Educational Foundation Inc., Princeton, NJ
Bakersfield Alliance Soccer Club, Bakersfield, CA
Balkan Rape Trauma Response Coalition, Chicago, IL
Ballet Theatre North, Northbrook, IL
Baltimore Softball Club, Baltimore, MD
Banyan House Inc., Sarasota, FL
Barnell Communications Inc., Miami, FL

Baroda Charitable Educational Fund Inc., Bristol, PA
Barren River Imaginative Museum of Science Inc., Bowling Green, KY
Basic 4 Food and Nutrition Program, Houston, TX
Basic of Louisiana Inc., New Orleans, LA
Batesville Community Day Care Inc., Batesville, IN
Battered and Harassed Women and Children Incorporated, Houston, TX
Battered Womens Fund, Tyler, TX
Bay Area Homes Network, Antioch, CA
Bay Area Multicultural Telecommunications Association, San Francisco, CA
Bay City Youth Football Association, Bay City, TX
Bay Minette Rotary Village Inc., Bay Minette, AL
Bayards Chimney Rock Museum, Bayard, NE
Baylor Ministries Inc., Moreno Valley, CA
BBB Housing Inc., Youngstown, OH
BCCU Inc. Clearfield, Clearfield, UT
BDC Brokerage Management Corporation, Baltimore, MD
Be True To Yourself Foundation, Seattle, WA
Beaverhead Community Food Pantry Inc., Ellon, MT
Beck Hilderbrand Historic Preservation Commission Inc., Bixby, OK
Becky Bos Memorial Scholarship Fund, East Jordan, MI
Beeches Crabtree Foundation Inc., Guthrie, OK
Believe Inc., Fort Worth, TX
Bells for Books Inc., Boise, ID
Bellwether Community Loan Fund Inc., Toledo, OH
Belmont Dare Inc., Belmont, MA
Beloved Ministries, Corpus Christi, TX
Beltway Lady Cougars Inc., Upper Marlboro, MD
Ben Radar Youth Foundation, Lewes, DE
Bergen Girls Recreational Softball League Inc., Montvale, NJ
Berkshire School of Creative Speech Inc., Great Barrington, MA
Berry Basket Quilters Inc., Medford, NJ
Best Care Help Services, Humble, TX
Beta Beta Educational Foundation Inc., Indianapolis, IN
Beth Dudley Scholarship Fund, Marietta, GA

Bethabara Shoppes Inc., Winston Salem, NC
Bethel Cultural Community Development Center Inc., Brooklyn, NY
Bethesda After-School Care Program Inc., Aberdeen, NC
Bethesda House Inc., Brooklyn, NY
Bethlehem Inc., Bethany, OK
Bettendorf Jaycees Foundation, Bettendorf, IA
Better Quality of Life Inc., Landover, MD
Between Us Sisters Starting to Operate Proficiently, Stockton, CA
BEU Community Housing Development Organization Inc., Cleveland, OH
Beverly Park Playground Project, Livonia, MI
Bi-State Illinois and Iowa Chapter of the Southern Christian, Rock Island, IL
Bicycle Transportation Alliance of Portland Inc., Portland, ME
Big Brother and Big Sister Inc., Bismarck, ND
Big Brother Big Sister of the Midlands, Santee, SC
Big Brothers and Big Sisters of N. Central Arkansas Inc., Conway, AR
Big Brothers Big Sisters Foundation of Manatee County Florida Inc., Bradenton, FL
Big Lake Elementary School Parent Teacher Student Organization, Elk River, MN
Big Sky Sculpture Council, Billings, MT
Big World Ventures Inc., Albuquerque, NM
Bill Cobb Ministries Inc., Bethany, OK
Billerica Youth Soccer Association, Billerica, MA
Binghamton Outreach Center Inc., Binghamton, NY
Bios the Western New York Lead Institute, Buffalo, NY
Birmingham Association of Black Journalists Inc., Birmingham, AL
Birth Parents Support, Cincinnati, OH
Birthright of Greater Meriden Inc., Meriden, CT
Black Family Foundation Inc., Brooklyn, NY
Black Healthcare Initiative Coalition Inc., Rockford, IL
Black Sheep Theater Company Inc., New York, NY
Black United Federation of Texas Charities Inc., Houston, TX

Black Women Community Organization Inc., Kansas City, KS

Blackhawk Central City Railway & Mining Museum LTD., Englewood, CO

Blacks United to Save Our Youths, Cleveland, OH

Blanchard School Parent Advisory Council Inc., Uxbridge, MA

Blink Inc., Visalia, CA

Bloomfield Academy Inc., Bloomfield, CT

Bludance Theatre Inc., Kent, CT

Blue Veil Ministry Inc., Tucson, AZ

Blue World Conservancy LTS., Haddam, CT

Bluff Swamp Wildlife Refuge & Botanical Garden Inc., Prairieville, LA

Blunt Park Athletic Assoc. of Springfield Massachusetts, Springfield, MA

BNS Family Solutions, Kalamazoo, MI

Bob Fry Memorial Golf Tournament, Walcott, IA

Bob Smith Ministries Inc., Boca Raton, FL

Boise Basin Interpretive Association Inc., Idaho City, ID

Book-Link Foundation Inc., Tupelo, MS

Books Building a Childs Future, Irving, TX

Books for Life, Pittsford, VT

Bookworms Resource Center, Philadelphia, PA

Boone County Court Appointed Special Advocate Inc., Florence, KY

Bosque County Tourism Council Incorporated, Meridian, TX

Boulder County Business Hall of Fame Inc., Boulder, CO

Boulder-Dushanbe Teahouse Trust, Boulder, CO

Boulder Valley Hockey Foundation, Boulder, CO

Boulderiety Inc., Boulder, CO

Bound for Success, Dallas, TX

Boyd Adult Care Group Homes Incorporated, Toledo, OH

Boys & Girls Club of Warren Inc., Warren, MA

Boys and Girls Club of Chico California Inc., Chico, CA

Boys and Girls Club of Wayne and Pike Counties Inc., Hamlin, PA

Brad Smith Music Ministries, Brentwood, TN

Brazos 2020 Vision Inc., Bryan, TX

Brazos Summer Explorers Inc., Bryan, TX

Brazos Valley Regional Advisory Council, College Station, TX

Bread of Life Christian Mission, Plant City, FL

Breast Cancer Coalition of NJ Inc., Trenton, NJ

Brenham-Washington County Swim Club Inc., Brenham, TX

Bridge and Gate Productions Inc., Sunnyvale, CA

Bridge to Victory Inc., Ft. Lauderdale, FL

Bridgeport Cultural Trust Inc., Bridgeport, CT

Bridges to Community Inc., Chappaqua, NY

Bridgewater Partnership Inc., Bridgewater, MA

Bridgework for a Better Tomorrow Association, Raleigh, NC

Briggs-Delaine Cultural Center, Summerton, SC

Bristow Education Foundation Inc., Bristow, OK

British American Drama Academy, San Francisco, CA

Broadhurst Charity Foundation, Manchester, MO

Bronx Second Chance Project Inc., Bronx, NY

Brooks Brothers Christian Alliance Incorporated, Tulsa, OK

Brookside Housing Services Corp., South Plainfield, NJ

Broome County Sheriffs Foundation, Vestal, NY

Brotherhood Association of America Development Inc., Oklahoma City, OK

Broussards Nutrition Program, Houston, TX

Brownsville Area Redstone Field Light Committee, Brownsville, PA

Brownsville Boxing Club, Brownsville, TX

Brownsville Community Neighborhood Action Center No. 1, Brooklyn, NY

Bruce Williams Ministries Inc., Columbia, SC

Bryan Police Activities League Inc., Bryan, TX

Buckeye Cheerleading Coaches Association Inc., Canton, OH

Bucks County Christian Action Council, Doylestown, PA

Buffalo Coalition for Common Ground, Buffalo, NY

Buffalo Public Housing Resident Council Corp., Buffalo, NY

Build America Inc., Overland Park, KS

Builders for Peace Inc., Washington, DC

Building Bridges Inc., Monticello, MN

Bunker Softball Association, Bunker, MO

Burlington Symphony Orchestra, Burlington, NJ

Business-Higher Education Federation, Washington, DC

Butler County Men Mission Inc., Eldorado, KS

By His Spirit Ministries, Titusville, FL

If an organization listed above submits information that warrants the renewal of its classification as a public charity or as a private operating foundation, the Internal Revenue Service will issue a ruling or determination letter with the revised classification as to foundation status. Grantors and contributors may thereafter rely upon such ruling or determination letter as provided in section 1.509(a)-7 of the Income Tax Regulations. It is not the practice of the Service to announce such revised classification of foundation status in the Internal Revenue Bulletin.

Travel and Tour Activities of Exempt Organizations; Hearing Announcement 98-108

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Notice of public hearing on proposed rulemaking.

SUMMARY: This document contains a notice of public hearing on proposed regulations that clarify when the travel and tour activities of tax exempt organizations are substantially related to the purposes for which exemption was granted.

DATES: The public hearing is being held on Wednesday, February 10, 1999, at 10 a.m. The IRS must receive outlines of topics to be discussed at the hearing by January 20, 1999.

ADDRESSES: The public hearing is being held in room 2615, Internal Revenue Building, 1111 Constitution Avenue, NW, Washington, DC. Due to building security procedures, visitors must enter at the 10th Street entrance, located between Constitution and Pennsylvania Avenues, NW. In addition, all visitors must present photo identification to enter the building.

Mail outlines to: CC:DOM:CORP:R (REG-121268-97), room 5226, Internal Revenue Service, POB 7604, Ben Franklin Station, Washington, DC 20044. Hand deliver outlines Monday through Friday between the hours of 8 a.m. and 5 p.m. to: CC:DOM:CORP:R (REG-121268-97), Courier's Desk, Internal Revenue Service, 1111 Constitution Avenue, NW, Washington, DC. Submit outlines electronically via the Internet by selecting the "Tax Regs" option on the IRS Home Page, or by submitting them directly to the IRS Internet site at http://www.irs.ustreas.gov/prod/tax_reggs/comments.html.

FOR FURTHER INFORMATION CONTACT: Concerning submissions of comments, the hearing, and/or to be placed on the building access list to attend the hear-

ing LaNita VanDyke, (202) 622-7190 (not a toll-free number).

SUPPLEMENTARY INFORMATION:

The subject of the public hearing is proposed regulations (REG-121268-97) that were published in the **Federal Register** on April 23, 1998 (63 F.R. 20156 [1998-20 I.R.B. 12]).

The rules of 26 CFR 601.601(a)(3) apply to the hearing.

Persons who have submitted written comments and wish to present oral comments at the hearing, must submit an outline of the topics to be discussed and the amount of time to be devoted to each topic (signed original and eight (8) copies) by January 20, 1999.

A period of 10 minutes is allotted to each person for presenting oral comments.

After the deadline for receiving outlines has passed, the IRS will prepare an agenda containing the schedule of speakers. Copies of the agenda will be made available, free of charge, at the hearing.

Because of access restrictions, the IRS will not admit visitors beyond the immediate entrance area more than 15 minutes before the hearing starts. For information about having your name placed on the building access list to attend the hearing, see the "FOR FURTHER INFORMATION CONTACT" section of this document.

Cynthia E. Grigsby,
Chief, Regulations Unit,
Assistant Chief Counsel (Corporate).

(Filed by the Office of the Federal Register on November 9, 1998, 8:45 a.m., and published in the issue of the Federal Register for November 10, 1998, 63 F.R. 63016)

Definition of Terms

Revenue rulings and revenue procedures (hereinafter referred to as "rulings") that have an effect on previous rulings use the following defined terms to describe the effect:

Amplified describes a situation where no change is being made in a prior published position, but the prior position is being extended to apply to a variation of the fact situation set forth therein. Thus, if an earlier ruling held that a principle applied to A, and the new ruling holds that the same principle also applies to B, the earlier ruling is amplified. (Compare with *modified*, below).

Clarified is used in those instances where the language in a prior ruling is being made clear because the language has caused, or may cause, some confusion. It is not used where a position in a prior ruling is being changed.

Distinguished describes a situation where a ruling mentions a previously published ruling and points out an essential difference between them.

Modified is used where the substance of a previously published position is being changed. Thus, if a prior ruling held that a principle applied to A but not to B, and the new ruling holds that it ap-

plies to both A and B, the prior ruling is modified because it corrects a published position. (Compare with *amplified* and *clarified*, above).

Obsoleted describes a previously published ruling that is not considered determinative with respect to future transactions. This term is most commonly used in a ruling that lists previously published rulings that are obsoleted because of changes in law or regulations. A ruling may also be obsoleted because the substance has been included in regulations subsequently adopted.

Revoked describes situations where the position in the previously published ruling is not correct and the correct position is being stated in the new ruling.

Superseded describes a situation where the new ruling does nothing more than restate the substance and situation of a previously published ruling (or rulings). Thus, the term is used to republish under the 1986 Code and regulations the same position published under the 1939 Code and regulations. The term is also used when it is desired to republish in a single ruling a series of situations, names, etc., that were previously published over a period of time in separate rulings. If the

new ruling does more than restate the substance of a prior ruling, a combination of terms is used. For example, *modified* and *superseded* describes a situation where the substance of a previously published ruling is being changed in part and is continued without change in part and it is desired to restate the valid portion of the previously published ruling in a new ruling that is self contained. In this case the previously published ruling is first modified and then, as modified, is superseded.

Supplemented is used in situations in which a list, such as a list of the names of countries, is published in a ruling and that list is expanded by adding further names in subsequent rulings. After the original ruling has been supplemented several times, a new ruling may be published that includes the list in the original ruling and the additions, and supersedes all prior rulings in the series.

Suspended is used in rare situations to show that the previous published rulings will not be applied pending some future action such as the issuance of new or amended regulations, the outcome of cases in litigation, or the outcome of a Service study.

Abbreviations

The following abbreviations in current use and formerly used will appear in material published in the Bulletin.

A—Individual.
Acq.—Acquiescence.
B—Individual.
BE—Beneficiary.
BK—Bank.
B.T.A.—Board of Tax Appeals.
C.—Individual.
C.B.—Cumulative Bulletin.
CFR—Code of Federal Regulations.
CI—City.
COOP—Cooperative.
Ct.D.—Court Decision.
CY—County.
D—Decedent.
DC—Dummy Corporation.
DE—Donee.
Del. Order—Delegation Order.
DISC—Domestic International Sales Corporation.
DR—Donor.
E—Estate.
EE—Employee.

E.O.—Executive Order.
ER—Employer.
ERISA—Employee Retirement Income Security Act.
EX—Executor.
F—Fiduciary.
FC—Foreign Country.
FICA—Federal Insurance Contribution Act.
FISC—Foreign International Sales Company.
FPFH—Foreign Personal Holding Company.
F.R.—Federal Register.
FUTA—Federal Unemployment Tax Act.
FX—Foreign Corporation.
G.C.M.—Chief Counsel's Memorandum.
GE—Grantee.
GP—General Partner.
GR—Grantor.
IC—Insurance Company.
I.R.B.—Internal Revenue Bulletin.
LE—Lessee.
LP—Limited Partner.
LR—Lessor.
M—Minor.
Nonacq.—Nonacquiescence.
O—Organization.
P—Parent Corporation.

PHC—Personal Holding Company.
PO—Possession of the U.S.
PR—Partner.
PRS—Partnership.
PTE—Prohibited Transaction Exemption.
Pub. L.—Public Law.
REIT—Real Estate Investment Trust.
Rev. Proc.—Revenue Procedure.
Rev. Rul.—Revenue Ruling.
S—Subsidiary.
S.P.R.—Statements of Procedural Rules.
Stat.—Statutes at Large.
T—Target Corporation.
T.C.—Tax Court.
T.D.—Treasury Decision.
TFE—Transferee.
TFR—Transferor.
T.I.R.—Technical Information Release.
TP—Taxpayer.
TR—Trust.
TT—Trustee.
U.S.C.—United States Code.
X—Corporation.
Y—Corporation.
Z—Corporation.

Numerical Finding List¹

Bulletins 1998–29 through 47

Announcements:

98–62, 1998–29 I.R.B. 13
98–68, 1998–29 I.R.B. 14
98–69, 1998–30 I.R.B. 16
98–70, 1998–30 I.R.B. 17
98–71, 1998–30 I.R.B. 17
98–72, 1998–31 I.R.B. 14
98–73, 1998–31 I.R.B. 14
98–74, 1998–31 I.R.B. 15
98–75, 1998–31 I.R.B. 15
98–76, 1998–32 I.R.B. 64
98–77, 1998–34 I.R.B. 30
98–78, 1998–34 I.R.B. 30
98–79, 1998–34 I.R.B. 31
98–80, 1998–34 I.R.B. 32
98–81, 1998–36 I.R.B. 35
98–82, 1998–35 I.R.B. 17
98–83, 1998–36 I.R.B. 36
98–84, 1998–38 I.R.B. 30
98–85, 1998–38 I.R.B. 30
98–86, 1998–38 I.R.B. 31
98–87, 1998–40 I.R.B. 11
98–88, 1998–41 I.R.B. 14
98–89, 1998–40 I.R.B. 11
98–90, 1998–42 I.R.B. 22
98–91, 1998–40 I.R.B. 12
98–92, 1998–41 I.R.B. 15
98–93, 1998–43 I.R.B. 10
98–94, 1998–43 I.R.B. 32
98–95, 1998–44 I.R.B. 13
98–96, 1998–44 I.R.B. 18
98–97, 1998–44 I.R.B. 18
98–98, 1998–44 I.R.B. 18
98–99, 1998–46 I.R.B. 34
98–100, 1998–46 I.R.B. 42
98–101, 1998–45 I.R.B. 27
98–102, 1998–45 I.R.B. 28
98–103, 1998–47 I.R.B. 12
98–104, 1998–47 I.R.B. 13

Court Decisions:

2063, 1998–36 I.R.B. 13
2064, 1998–37 I.R.B. 4
2065, 1998–39 I.R.B. 7

Notices:

98–36, 1998–29 I.R.B. 8
98–37, 1998–30 I.R.B. 13
98–38, 1998–34 I.R.B. 7
98–39, 1998–33 I.R.B. 11
98–40, 1998–35 I.R.B. 7
98–41, 1998–33 I.R.B. 12
98–42, 1998–33 I.R.B. 12
98–43, 1998–33 I.R.B. 13
98–44, 1998–34 I.R.B. 7
98–45, 1998–35 I.R.B. 7
98–46, 1998–36 I.R.B. 21
98–47, 1998–37 I.R.B. 8
98–48, 1998–39 I.R.B. 17
98–49, 1998–38 I.R.B. 5
98–50, 1998–44 I.R.B. 10
98–51, 1998–44 I.R.B. 11
98–52, 1998–46 I.R.B. 16
98–53, 1998–46 I.R.B. 24

Notices—Continued

98–54, 1998–46 I.R.B. 25
98–55, 1998–46 I.R.B. 26
98–56, 1998–47 I.R.B. 9
98–57, 1998–47 I.R.B. 9

Railroad Retirement Quarterly Rate:

1998–31 I.R.B. 7

Proposed Regulations:

REG–209446–82, 1998–36 I.R.B. 24
REG–209060–86, 1998–39 I.R.B. 18
REG–209769–95, 1998–41 I.R.B. 8
REG–209813–96, 1998–35 I.R.B. 9
REG–246256–96, 1998–34 I.R.B. 9
REG–104641–97, 1998–29 I.R.B. 9
REG–104565–97, 1998–39 I.R.B. 21
REG–106177–97, 1998–37 I.R.B. 33
REG–109708–97, 1998–45 I.R.B. 29
REG–115446–97, 1998–36 I.R.B. 23
REG–116608–97, 1998–29 I.R.B. 12
REG–118926–97, 1998–39 I.R.B. 23
REG–118966–97, 1998–39 I.R.B. 29
REG–119227–97, 1998–30 I.R.B. 13
REG–122488–97, 1998–42 I.R.B. 19
REG–101363–98, 1998–40 I.R.B. 10
REG–106221–98, 1998–41 I.R.B. 10
REG–110332–98, 1998–33 I.R.B. 18
REG–110403–98, 1998–29 I.R.B. 11
REG–115393–98, 1998–39 I.R.B. 34

Revenue Procedures:

98–40, 1998–32 I.R.B. 6
98–41, 1998–32 I.R.B. 7
98–42, 1998–28 I.R.B. 9
98–43, 1998–29 I.R.B. 8
98–44, 1998–32 I.R.B. 11
98–45, 1998–34 I.R.B. 8
98–46, 1998–36 I.R.B. 21
98–47, 1998–37 I.R.B. 8
98–48, 1998–38 I.R.B. 7
98–49, 1998–37 I.R.B. 9
98–50, 1998–38 I.R.B. 8
98–51, 1998–38 I.R.B. 20
98–52, 1998–37 I.R.B. 12
98–53, 1998–40 I.R.B. 9
98–54, 1998–43 I.R.B. 7
98–55, 1998–46 I.R.B. 27
98–56, 1998–46 I.R.B. 33

Revenue Rulings:

98–34, 1998–31 I.R.B. 12
98–35, 1998–30 I.R.B. 4
98–36, 1998–31 I.R.B. 6
98–37, 1998–32 I.R.B. 5
98–38, 1998–32 I.R.B. 4
98–39, 1998–33 I.R.B. 4
98–40, 1998–33 I.R.B. 4
98–41, 1998–35 I.R.B. 6
98–42, 1998–35 I.R.B. 5
98–43, 1998–36 I.R.B. 9
98–44, 1998–37 I.R.B. 4
98–45, 1998–38 I.R.B. 4
98–46, 1998–39 I.R.B. 10
98–47, 1998–39 I.R.B. 4
98–48, 1998–39 I.R.B. 6

Revenue Rulings—Continued

98–49, 1998–40 I.R.B. 4
98–50, 1998–40 I.R.B. 7
98–51, 1998–43 I.R.B. 4
98–52, 1998–45 I.R.B. 4
98–53, 1998–46 I.R.B. 12
98–54, 1998–46 I.R.B. 24
98–55, 1998–47 I.R.B. 5
98–56, 1998–47 I.R.B. 5

Tax Conventions:

1998–43 I.R.B. 6

Treasury Decisions:

8771, 1998–29 I.R.B. 6
8772, 1998–31 I.R.B. 8
8773, 1998–29 I.R.B. 4
8774, 1998–30 I.R.B. 5
8775, 1998–31 I.R.B. 4
8776, 1998–33 I.R.B. 6
8777, 1998–34 I.R.B. 4
8778, 1998–36 I.R.B. 4
8779, 1998–36 I.R.B. 11
8780, 1998–39 I.R.B. 14
8781, 1998–40 I.R.B. 4
8782, 1998–41 I.R.B. 5
8783, 1998–41 I.R.B. 4
8784, 1998–42 I.R.B. 4
8785, 1998–42 I.R.B. 5
8786, 1998–44 I.R.B. 4
8787, 1998–46 I.R.B. 5
8788, 1998–45 I.R.B. 6

¹ A cumulative list of all revenue rulings, revenue procedures, Treasury decisions, etc., published in Internal Revenue Bulletins 1998–1 through 1998–28 will be found in Internal Revenue Bulletin 1998–29, dated July 20, 1998.

Finding List of Current Action on Previously Published Items¹

Bulletins 1998–29 through 47

*Denotes entry since last publication

Notices:

87–13

Modified by
98–49, 1998–38 I.R.B. 5

87–16

Modified by
98–49, 1998–38 I.R.B. 5

Revenue Procedures:

83–58

Obsolated by
98–37, 1998–32 I.R.B. 5

88–17

Clarified, modified, and superseded by
98–54, 1998–43 I.R.B. 7

94–23

Amplified and superseded by
98–55, 1998–46 I.R.B. 27

97–40

Amplified and superseded by
98–55, 1998–46 I.R.B. 27

97–60

Superseded by
98–50, 1998–38 I.R.B. 8

97–61

Superseded by
98–51, 1998–38 I.R.B. 20

98–14

Modified by
98–53, 1998–40 I.R.B. 9

Revenue Rulings:

57–271

Obsolated by
98–37, 1998–32 I.R.B. 5

67–301

Modified by
98–41, 1998–35 I.R.B. 6

70–225

Obsolated by
98–44, 1998–37 I.R.B. 4

71–277

Obsolated by
98–37, 1998–32 I.R.B. 5

71–434

Obsolated by
98–37, 1998–32 I.R.B. 5

71–574

Obsolated by
98–37, 1998–32 I.R.B. 5

72–75

Obsolated by
98–37, 1998–32 I.R.B. 5

72–120

Obsolated by
98–37, 1998–32 I.R.B. 5

Revenue Rulings—Continued

72–121

Obsolated by
98–37, 1998–32 I.R.B. 5

72–122

Obsolated by
98–37, 1998–32 I.R.B. 5

74–77

Obsolated by
98–37, 1998–32 I.R.B. 5

75–19

Obsolated by
98–37, 1998–32 I.R.B. 5

76–562

Obsolated by
98–37, 1998–32 I.R.B. 5

77–214

Obsolated by
98–37, 1998–32 I.R.B. 5

79–106

Obsolated by
98–37, 1998–32 I.R.B. 5

83–113

Obsolated by
98–37, 1998–32 I.R.B. 5

85–143

Obsolated by
98–37, 1998–32 I.R.B. 5

88–8

Obsolated by
98–37, 1998–32 I.R.B. 5

88–76

Obsolated by
98–37, 1998–32 I.R.B. 5

88–79

Obsolated by
98–37, 1998–32 I.R.B. 5

93–4

Obsolated by
98–37, 1998–32 I.R.B. 5

93–5

Obsolated by
98–37, 1998–32 I.R.B. 5

93–6

Obsolated by
98–37, 1998–32 I.R.B. 5

93–30

Obsolated by
98–37, 1998–32 I.R.B. 5

93–38

Obsolated by
98–37, 1998–32 I.R.B. 5

93–49

Obsolated by
98–37, 1998–32 I.R.B. 5

93–50

Obsolated by
98–37, 1998–32 I.R.B. 5

93–53

Obsolated by
98–37, 1998–32 I.R.B. 5

Revenue Rulings—Continued

93–81

Obsolated by
98–37, 1998–32 I.R.B. 5

3–91

Obsolated by
98–37, 1998–32 I.R.B. 5

93–92

Obsolated by
98–37, 1998–32 I.R.B. 5

93–93

Obsolated by
98–37, 1998–32 I.R.B. 5

94–5

Obsolated by
98–37, 1998–32 I.R.B. 5

94–6

Obsolated by
98–37, 1998–32 I.R.B. 5

94–30

Obsolated by
98–37, 1998–32 I.R.B. 5

94–51

Obsolated by
98–37, 1998–32 I.R.B. 5

94–79

Obsolated by
98–37, 1998–32 I.R.B. 5

95–2

Obsolated by
98–37, 1998–32 I.R.B. 5

95–9

Obsolated by
98–37, 1998–32 I.R.B. 5

97–37

Obsolated by
98–39, 1998–33 I.R.B. 4

¹ A cumulative finding list for previously published items mentioned in Internal Revenue Bulletins 1998–1 through 1998–28 will be found in Internal Revenue Bulletin 1998–29, dated July 20, 1998.

Notes

Notes

Notes

Superintendent of Documents Publications and Subscriptions Order Form

New Deposit Account?

Order processing code: *3119

Check here

NOTE: All prices include regular domestic postage and handling. Subscription prices are subject to change at any time. International customers, please add 25%. To fax your orders (202) 512-2250.

Publications

Qty.	Stock Number	Title	Price Each	Total Price
	021-066-00909-2	Subject Bibliography listing Cum. Bulletins prior to 1988 SB-066	FREE	FREE
	048-004-02277-0	Cum. Bulletin 1988-1 (Jan-June)	\$42	
	048-004-02279-6	Cum. Bulletin 1988-2 (July-Dec)	\$41	
	048-004-02291-5	Cum. Bulletin 1988-3	\$40	
	048-004-02286-9	Cum. Bulletin 1989-1 (Jan-June)	\$44	
	048-004-02292-3	Cum. Bulletin 1989-2 (July-Dec)	\$40	
	048-004-02295-8	Cum. Bulletin 1990-1 (Jan-June)	\$38	
	048-004-02300-8	Cum. Bulletin 1990-2 (July-Dec)	\$41	
	048-004-02305-9	Cum. Bulletin 1991-1 (Jan-June)	\$44	
	048-004-02309-1	Cum. Bulletin 1991-2 (July-Dec)	\$45	
	048-004-02310-5	Cum. Bulletin 1992-1 (Jan-June)	\$51	
	048-004-02317-2	Cum. Bulletin 1992-2 (July-Dec)	\$47	
Total for Publications				

Subscriptions

Qty.	List ID	Title	Price Each	Total Price
	N-914	Priority Announcements for Accountants	FREE	FREE
	IRB	Internal Revenue Bulletin	\$123	
		Optional— Add \$50 to open new Deposit Account and please check box in upper right corner		
Total Cost of Order				

FREE Priority Announcement Service

You can find out about new publications for tax practitioners and accountants—as they are released—through our FREE Priority Announcement Service. See above.

FUTURE EDITIONS of Internal Revenue Cumulative Bulletins are available through "STANDING ORDER SERVICE." Get these future editions—automatically—without having to initiate a purchase order.

AUTHORIZATION FOR STANDING ORDER SERVICE

I hereby authorize the Superintendent of Documents to charge my:

VISA, MasterCard, or Superintendent of Documents Deposit Account for the Standing Order item below selected and shipped to me.

Authorizing signature (Standing Orders not valid unless signed.)

Please print or type your name.

Office Phone Number ()

Qty.	Standing Order	Title
	ZIRSC	Internal Revenue Cumulative Bulletins

GPO DEPOSIT ACCOUNT

A Deposit Account will enable you to use Standing Order Service to receive subsequent volumes quickly and automatically. For an initial deposit of \$50 you can establish your GPO Deposit Account.

YES! Open a Deposit Account for me so I can order future publications quickly and easily. I'm enclosing the \$50.00 initial deposit.

Standing Order Service

Just sign the authorization above to charge selected items to your existing Deposit Account, VISA, or MasterCard account. Or open a Deposit Account with an initial deposit of \$50 or more. Your account will be charged only as each volume is issued and mailed. Sufficient money must be kept in your account to insure that items are shipped.

For privacy protection, check the box below:

Do not make my name available to other mailers

Check method of payment:

Check payable to Superintendent of Documents

GPO Deposit Account -

VISA or MasterCard Account 

(Credit card expiration date)

Thank you for your order!

(Authorizing Signature)

4/93

Purchase Order No. _____

(If purchase order included.)

Please type or print

(Company or Personal Name)

(Additional address/attention line)

(Street address)

(City, State, ZIP Code)

(Daytime phone including area code)

**Mail To: Superintendent of Documents
P.O. Box 371954, Pittsburgh, PA 15250-7954**

Standing Orders remain in effect until canceled in writing (telephone cancellations are accepted but must be followed up with a written cancellation within 10 days) or canceled by the Superintendent of Documents.

Service begins with the next issue released of each item selected. An acknowledgment card is sent for each Standing Order item selected.

INTERNAL REVENUE BULLETIN

The Introduction on page 3 describes the purpose and content of this publication. The weekly Internal Revenue Bulletin is sold on a yearly subscription basis by the Superintendent of Documents. Current subscribers are notified by the Superintendent of Documents when their subscriptions must be renewed.

CUMULATIVE BULLETINS

The contents of this weekly Bulletin are consolidated semiannually into a permanent, indexed, Cumulative Bulletin. These are sold on a single copy basis and *are not* included as part of the subscription to the Internal Revenue Bulletin. Subscribers to the weekly Bulletin are notified when copies of the Cumulative Bulletin are available. Certain issues of Cumulative Bulletins are out of print and are not available. Persons desiring available Cumulative Bulletins, which are listed on the reverse, may purchase them from the Superintendent of Documents.

HOW TO ORDER

Check the publications and/or subscription(s) desired on the reverse, complete the order blank, enclose the proper remittance, detach entire page, and mail to the Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402. Please allow two to six weeks, plus mailing time, for delivery.

WE WELCOME COMMENTS ABOUT THE INTERNAL REVENUE BULLETIN

If you have comments concerning the format or production of the Internal Revenue Bulletin or suggestions for improving it, we would be pleased to hear from you. You can e-mail us your suggestions or comments through the IRS Internet Home Page (www.irs.ustreas.gov) or write to the IRS Bulletin Unit, T:FP:F:CD, Room 5560, 1111 Constitution Avenue NW, Washington, DC 20224. You can also leave a recorded message 24 hours a day, 7 days a week at 1-800-829-9043.
